

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

Inam Naji,

Plaintiff,

vs.

Fluor Enterprises, Inc., d/b/a Fluor
Corporation,

Defendant.

Case No. 2019-CP-23-002538

**DEFENDANT’S RULE 26.01
RESPONSES**

TO: UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA
AND ALL PARTIES AND ATTORNEYS OF RECORD:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE:

Defendant Fluor Enterprises, Inc. (hereinafter “Defendant”), who is improperly identified in the Complaint as “Fluor Enterprises, Inc., d/b/a Fluor Corporation,” is presently unaware of any person or party who may have a subrogation interest in Plaintiffs’ claims. Defendant reserves its right to supplement this response as necessary.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE:

Plaintiff has requested a jury trial.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE:

Fluor Enterprises, Inc. is a for-profit corporation, which is wholly owned by Fluor Corporation, a for-profit corporation and publicly traded company. Fluor Enterprises, Inc. does not own ten percent or more of any publicly-owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE:

Based upon the information available to Defendant at this time, Defendant believes that Plaintiff's claims may be heard in the Greenville Division of the United States District Court.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason whole entail substantial duplication of labor if heard by different judges.

RESPONSE:

Defendant is not aware of any related matters.

(F) If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE:

Defendant Fluor Enterprises, Inc. is improperly identified in the Complaint at "Fluor Enterprises, Inc., d/b/a Fluor Corporation." Further, Fluor Enterprises, Inc. is not the proper defendant in this matter because it never employed Plaintiff as alleged in her Complaint. Rather, Plaintiff was previously employed by Fluor Federal Services, LLC.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person and describe the basis of said liability.

RESPONSE:

Defendant does not so contend at this time. Defendant reserves the right to supplement or amend this response as necessary.

Respectfully submitted,

s/ Jennifer S. Cluverius

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June 21, 2019

Greenville, South Carolina